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February 6, 2021

BY CM/ECF AND EMAIL

Hon. Analisa Torres,  
United States District Court,  
Southern District of New York,  
Daniel Patrick Moynihan U.S. Courthouse,  
500 Pearl Street,  
New York, NY 10007-1312.

Re: *Contrarian Capital Management LLC, et al. v. Bolivarian Republic of Venezuela,*  
19 Civ. 11018 (S.D.N.Y.) (rel. Nos. 18 Civ. 11940 and 19 Civ. 03123)

Dear Judge Torres:

I write on behalf of Defendant the Bolivarian Republic of Venezuela (the “Republic”) in the above-captioned action (the “Action”). On October 1, 2020, this Court entered an order that, among other things, directed Plaintiffs to submit a motion for attorney’s fees by October 30, 2020, and the Republic to oppose any such motion by November 30, 2020. ECF No. 74. On October 30, Plaintiffs filed their Motion for Attorney Fees (“Plaintiffs’ Fee Motion”). ECF Nos. 82-23. The parties have made four prior extension requests, which the Court granted. ECF Nos. 85-88, 94-95, 97-98.

The parties are continuing to engage in active, good faith discussions to attempt to reach a consensual resolution of this matter. While productive, those discussions have not yet concluded. In order to allow those discussions to continue, the parties have agreed to a four-week extension of the Republic’s time to oppose Plaintiffs’ Fee Motion. Accordingly, in an effort to avoid further litigation in this Action, the Republic respectfully requests that the Court extend the deadline for its opposition to March 8, 2021.

GRANTED. By **March 8, 2021**, Defendant shall file its opposition to Plaintiffs’ motion for attorney’s fees.

SO ORDERED.

Dated: February 8, 2021  
New York, New York

  
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ANALISA TORRES  
United States District Judge